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VIA ECF

The Honorable Lewis J. Liman
United States District Court for the Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl St., Room 1620
New York, NY 10007

Re: Lively v. Wayfarer Studios LLC, et al., No. 1:24-cv-10049-LJL

Dear Judge Liman:

On behalf of Blake Lively, we write pursuant to Rule 4.b of Attachment A to the Court's Individual Rules and Practices to respectfully request that the Court preliminarily seal (i) Exhibit F to the Declaration of Esra Hudson in Support of Plaintiff Blake Lively's Opposition to Third-Party Perez Hilton's Motion for Protective Order and Cross Motion to Compel, and (ii) portions of Plaintiff Blake Lively's Opposition to Third-Party Perez Hilton's Motion for Protective Order and Cross Motion to Compel ("Opposition"), both of which are filed contemporaneously herewith. Exhibit F consists of a document produced by Defendant Melissa Nathan in this case, which is designated as "Confidential." The Opposition contains numerous quotations from discovery material produced with "Confidential" designations, and the public version has been redacted accordingly, with an unredacted version filed under seal. In accordance with Rule 4.b of Attachment A, Ms. Lively respectfully requests that the Court not rule on this letter-motion to seal for one week, so that the parties have the opportunity to meet and confer, and other parties may file a motion.

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Respectfully submitted,

/s/ Esra A. Hudson

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